UNITED STATES DISTRICT	COURT
for the	

OCT 1 8 2018

For the

Southern District of Texas

United States of America
v.

Victor MARTINEZ-De La Cruz
YOB: 1983
Mexico

Mexico

Model of Texas

Carter Court
Case No. Martinez-Martinez

Defendant(s)

CRIMINAL COMPLAINT

Southern District of Texas , the defendant(s) violated: **Code Section** **Offense Description** 21 USC 952(a) & 21 USC 841(a)(1) **Knowingly and intentionally attempt to import into the United States from the United, Mexican States approximately 6.42 kilograms of cocaine, a Schedule II controlled substance under the Controlled Subtances Act, and did knowingly and intentionally possess with the intent to distribute approximately 6.42 kilograms of cocaine, a Schedule II controlled Subtances Act, and did knowingly and intentionally possess with the intent to distribute approximately 6.42 kilograms of cocaine, a Schedule II controlled Subtances Act, and did knowingly and intentionally possess with the intent to distribute approximately 6.42 kilograms of cocaine, a Schedule II controlled Subtances Act, and did knowingly and intentionally possess with the intent to distribute approximately 6.42 kilograms of cocaine, a Schedule II controlled Subtance Act, and did knowingly and intentionally possess with the intent to distribute approximately 6.42 kilograms of cocaine, a Schedule II controlled Subtance Act, and did knowingly and intentionally attempt to import into the United States from the United States approximately 6.42 kilograms of cocaine, a Schedule II controlled Subtance Act, and did knowingly and intentionally attempt to import into the United States from the United States from the United States approximately 6.42 kilograms of cocaine, a Schedule II controlled Subtance Act, and did knowingly and intentionally attempt to 4.24 kilograms of cocaine, a Schedule II controlled Subtance Act, and did knowingly and intentionally attempt to 4.24 kilograms of cocaine, a Schedule II controlled Subtance Act, and did knowingly and intentionally possess with the intent to distribute approximately 6.42 kilograms of cocaine, a Schedule II controlled Subtance Act, and did knowingly attempt to 5.42 kilograms of	I, the con	mplainant in this ca	ase, state that the following	ng is true to the best of my	knowledge and belie	f.
Code Section 21 USC 952(a) & 21 USC 841(a)(1) Knowingly and intentionally attempt to import into the United States from the United Mexican States approximately 6.42 kilograms of cocaine, a Schedule II controlled substance under the Controlled Subtances Act, and did knowingly and intentionally possess with the intent to distribute approximately 6.42 kilograms of cocaine, a Schedule II controlled substance under the Controlled Substance act. This criminal complaint is based on these facts: See attachment A Continued on the attached sheet. Complainent's signature Rene Santos, Special Agent Printed name and title Sworn to before me and signed in my presence. Date: 10/18/2018	On or about the	date(s) of	October 17, 2018	in the county of	Hidalgo	in the
21 USC 952(a) & 21 USC 841(a)(1) Knowingly and intentionally attempt to import into the United States from the United, Mexican States approximately 6.42 kilograms of cocaine, a Schedule II controlled substance under the Controlled Subtances Act, and did knowingly and intentionally possess with the intent to distribute approximately 6.42 kilograms of cocaine, a Schedule II controlled substance under the Controlled Substance under the Controlled Substance and the Controlled Su	Southern	_ District of	Texas , the	e defendant(s) violated:		
United Mexican States approximately 6.42 kilograms of cocaine, a Schedule II controlled substance under the Controlled Substance Act, and did knowingly and intentionally possess with the intent to distribute approximately 6.42 kilograms of cocaine, a Schedule II controlled substance under the Controlled Substance Act. This criminal complaint is based on these facts: See attachment A Complaint's signature Rene Santos, Special Agent Printed name and title Sworn to before me and signed in my presence.	Code i	Section		Offense Description	on	
See attachment A Continued on the attached sheet. Complainant's signature Rene Santos, Special Agent Printed name and title Date: 10/18/2018	21 USC 952(a) 8	3 21 USC 841(a)(1	United, Mexican Sta II controlled substa knowingly and inter 6.42 kilograms of c	ates approximately 6.42 kilo nce under the Controlled Si ntionally possess with the ir ocaine, a Schedule II contro	grams of cocaine, a subtances Act, and dic atent to distribute app	Schedule I roximately
Continued on the attached sheet. Proved by David A. Lindon H. Complaintn's signature Rene Santos, Special Agent Printed name and title Date: 10/18/2018	This crir	minal complaint is	based on these facts:	1		
Proved by David A. Lindenn-th Complainant's signature Rene Santos, Special Agent Printed name and title Date: 10/18/2018	See attachmen	t A				
Sworn to before me and signed in my presence. Date: 10/18/2018			A. Lindon-H		-	t ,
Duit.	Sworn to before	me and signed in i	, , , , , , , , , , , , , , , , , , ,	Pr	inted name and title	
- Jungo bugunine	Date: 10	0/18/2018			Judge's signature	
City and state: McAllen, Texas J. Book Hacker U.S. Magistrate Judge	City and state:	Mo	cAllen, Texas			ludge
Printed name and title	-				inted name and title	

Case 7:18-cr-01826 Document 1 Filed on 10/18/18 in TXSD Page 2 of 2 ATTACHMENT A

On October 17, 2018, at approximately 7:49 AM, Victor MARTINEZ-De La Cruz applied for admission into the United States at the Pharr, Texas, Port of Entry. MARTINEZ was driving a vehicle with a Mexican license plate and stated that the purpose of his visit was to go food shopping. During primary inspection MARTINEZ gave a negative declaration for narcotics, currency over ten thousand dollars, weapons and ammunitions to the Customs and Border Protection (CBP) officer. MARTINEZ was referred for a secondary inspection where a CBP canine (K-9) alerted to the odor of narcotics in the vehicle. An x-ray scan of the vehicle was conducted which resulted in the discovery of anomalies in the vehicle's muffler. An examination of the muffler, by the CBP officers, revealed a hidden trap door on top of the muffler. Further inspection by the CBP officers resulted in the discovery of concealed packages, inside the muffler, which field tested positive for cocaine. A total of 6 brick shaped packages containing approximately 6.42 kilograms of cocaine was located concealed within the gas tank.

Homeland Security Investigations (HSI) Special Agent Rene Santos conducted an interview of MARTINEZ. After waiving his Miranda Rights, MARTINEZ stated that an unknown man in Reynosa, Mexico had told him he had to smuggle some packages into the United States using his vehicle. MARTINEZ stated that he knew he was smuggling some type of narcotics. MARTINEZ stated that on the afternoon before he was arrested, an unknown man took his vehicle, later during the night the vehicle was returned and he was giving instructions on where to leave his vehicle once he crossed into the US.